

U S WEST, Inc.  
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Washington, DC 20036  
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DOCKET FILE COPY ORIGINAL **USWEST**

**Elridge A. Stafford**  
Executive Director-  
Federal Regulatory

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JAN 10 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

January 10, 2000

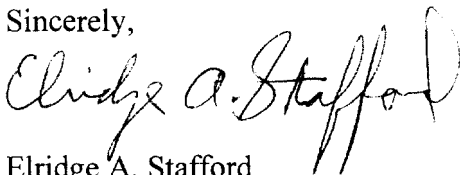
Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
Room TW-A325  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: NSD-L-99-96; CC Docket No. 96-98

Dear Ms. Salas:

Please associate the attached letter to the above-referenced proceeding. Although the attached letter was filed in an unrelated proceeding, the letter generally outlines U S WEST's position with respect to state petitions for additional delegated authority with regard to number conservation/optimization issues.

Sincerely,



Elridge A. Stafford  
Executive Director – Federal Regulatory

Attachment

cc: Al McCloud

No. of Copies rec'd 014  
List A B C D E

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Washington, DC 20036  
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**USWEST**

Elridge A. Stafford  
Executive Director  
Federal Regulatory

December 15, 1999

**WRITTEN EX PARTE**

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12th Street, SW, TW-A325  
Washington, DC 20554

RECEIVED  
DEC 15 1999  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

Re: NSD-L-99-83; CC Docket No. 96-98

Dear Ms. Salas:

Through this letter, U S WEST, Inc. ("U S WEST") requests that the Federal Communications Commission ("FCC" or "Commission") allow the withdrawal of a filing made by U S WEST in the above-referenced dockets on December 3, 1999.

U S WEST is already on record in a number of proceedings involving state petitions for relief (under the general parameters suggested in the Pennsylvania Numbering Order),<sup>1</sup> in opposing the kind of *ad hoc* types of relief being requested by the Nebraska Commission.<sup>2</sup> We remain of the opinion that granting the type of authority requested by the Nebraska Commission will not best serve the pressing public policy interests advanced by the FCC. We believe this to be true whether the issue be number conservation or number optimization, including delegations of authority to establish state-specific pooling trials.

It is U S WEST's opinion that the dedication of resources for conservation efforts should be at the national and not state level. This is particularly true where the state-initiated conservation efforts will involve the utilization of technology that does not allow for full electronic systemization associated with the conservation efforts. The industry is working toward a Number Portability Administration Center (NPAC) release 3.0 that will allow number pooling to be accomplished in a more efficient and economic manner. The

<sup>1</sup> See Pennsylvania Numbering Order, 13 FCC Rcd. 19009 (1998); pets. for recon. pending.

<sup>2</sup> See, e.g., In the Matters of Massachusetts Department of Telecommunications and Energy's Petition for Waiver to Implement a Technology-Specific Overlay in the 508, 617, 781 and 978 Area Codes; Massachusetts Department of Telecommunications and Energy's Petition for Waiver of Section 52.19 to Implement Various Area Code Conservation Measures in the 508, 617, 781, and 978 Area Codes, NSD File Nos. L-99-17 and L-99-19, Comments of U S WEST Communications, Inc., filed Apr. 5, 1999, and also associated with File Nos. NSD-L-99-33, NSD-L-99-21 and NSD-L-99-27.

Ms. Magalie Roman Salas  
December 15, 1999  
Page 2

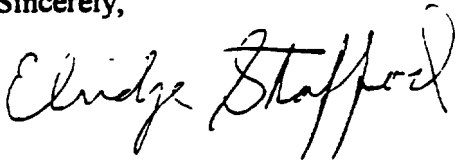
states' pooling proposals that use existing technologies and systems (e.g. NPAC versions prior to 3.0) increase unnecessarily carriers' overall costs to implement number pooling.

Because the additional authority requested by the Nebraska Commission will not postpone the need for relief within the 402 area code, the FCC should deny the requested relief. This is true both with respect to number pooling and the reclamation of numbers. As the Commission recently noted, the two are intertwined.<sup>3</sup> Moreover, U S WEST suggests that a state's request for broad additional authority without a precise identification of authority requested (i.e., "any other measures . . . to address the pressing problem of number exhaust and depletion."),<sup>4</sup> should also be denied, because the Commission and any interested party should first review and comment upon the particular pooling procedure or mechanism that is being considered by the state commission.

Please arrange for this letter filing to be associated with the above-referenced dockets (an extra copy is also provided pursuant to the Commission's *ex parte* rules).

Acknowledgment and date of receipt of this submission are requested. A duplicate of this letter is attached for this purpose.

Sincerely,



Elridge A. Stafford  
Executive Director - Federal Regulatory

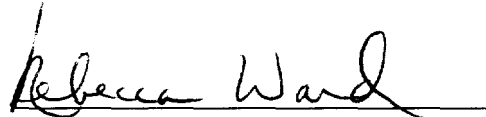
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<sup>3</sup> California Order, CC Docket No. 96-98; NSD File No. L-98-136, Order, FCC 99-248, rel. Sep. 15, 1999 ¶ 36 ("to the extent we have delegated the authority to initiate a thousands-block number pooling trial, we also delegate authority to the California Commission to reclaim unused thousands blocks in connection with that trial.").

<sup>4</sup> Nebraska Petition at 0.

## **CERTIFICATE OF SERVICE**

I, Rebecca Ward, do hereby certify that on this 10<sup>th</sup> day of January, 2000, I have caused a copy of the foregoing **LETTER** to be served, via first class United States mail, postage pre-paid, upon the persons listed on the attached service list.

  
Rebecca Ward

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\*Served via hand delivery

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Last update: 1/10/2000